

1  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
v.	) No. 4:22 MJ 3010 NCC
	)
HUSSEIN KADHIM ABOOD KHALAF,	)
	)
Defendant.	)

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Allison H. Behrens, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with 18 U.S.C. Sections 875(b), (c) and (d) (threatening communications in interstate commerce) and 18 U.S.C. Section 2261A(2) (cyberstalking).
2. Defendant is not a citizen of the United States. He is a citizen of Iraq. He is presently in the United States on a student visa for studies at St. Louis University.
3. During an interview with law enforcement agents, Defendant told agents he knows people who can smuggle him out of the United States to Canada.
4. There is a serious risk that the defendant will flee.

5. Following a search warrant of his residence, and an interview with law enforcement officers, Defendant reached out to the victim in this case. While Defendant did not make any threats at that time, because of the threats he has made to her which led to the instant criminal complaint, there is a serious risk that defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

SAYLER A. FLEMING  
United States Attorney

*s/Allison H. Behrens*  
ALLISON H. BEHRENS, #38482MO  
Assistant United States Attorney